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August 13, 2021

Hon. Richard J. Sullivan
United States District Judge
U.S. Courthouse
500 Pearl Street
New York, NY 10007

Re: U.S. v. Joe Rodriguez
09 CR 1228 (RJS)

Dear Judge Sullivan:

With the consent of the government by AUSA Sebastian Swett we write to request that the sentencing hearing on the violation of supervised release in the above case scheduled for August 23, 2021 be adjourned for approximately 30 days for undersigned counsel to confer with his client to prepare for sentence. This request is occasioned by counsel's inability to communicate with his client regarding the upcoming sentence because unbeknownst to counsel Mr. Rodriguez had been in the hospital for over two weeks. Counsel does not know the reason for the hospitalization and has not spoken to Mr. Rodriguez. Accordingly, we request that the sentence hearing be adjourned for approximately thirty days to allow counsel time to prepare for the sentence hearing and to find out the reason for the hospitalization and the prognosis.

Sincerely,

/S/ Louis Freeman
Louis Freeman

On consent of the parties, the request for adjournment is GRANTED. IT IS HEREBY ORDERED THAT the sentencing hearing previously scheduled for August 23, 2021 will take place on Thursday, September 23, 2021 at 3:00 p.m. The defense shall file any updates to its sentencing submission by September 9, 2021. The government shall file its sentencing submission, previously due August 16, 2021, by September 16, 2021. Probation shall submit an updated recommendation for sentencing by September 20, 2021.

Date: August 13, 2021
New York, NY

SO ORDERED:



RICHARD J. SULLIVAN
U.S.C.J., Sitting by Designation